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**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, D.C. 20554

**Re: *In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42*  
*AT&T Notice for Forbearance from Lifeline BIAS Requirements***

Dear Ms. Dortch,

In accordance with the Commission's 2016 Reform Order<sup>1</sup> and Wireline Competition Bureau Guidance,<sup>2</sup> AT&T Services, Inc., on behalf of its ILEC affiliates designated as eligible telecommunications carriers (ETCs), files this Notice of Forbearance from Lifeline broadband internet access service (BIAS) requirements due to a material change in circumstances, effective January 1, 2022.

On November 23, 2016, AT&T ILEC entities in eighteen AT&T ILEC states accepted the FCC's forbearance relief from any requirement to offer Lifeline benefits on BIAS in all of the Census Blocks within their ETC service areas, except in the CAF II funded Census Blocks.<sup>3</sup>

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<sup>1</sup> *Lifeline and Link Up Reform and Modernization Third Report and Order, Further Report and Order, and Order on Reconsideration*, WC Docket No. 11-42, 31 FCC Rcd 3962 (rel. April 27, 2016) ("2016 Reform Order").

<sup>2</sup> See *Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, FCC Public Notice, DA 16-1118, at n.15 (Sept. 30, 2016) ("...the forbearance notice is not a one-time requirement...we interpret that forbearance also to encompass ETCs that only can elect forbearance for census blocks once the obligations and circumstances materially change. For example, certain high-cost support mechanisms have support terms that last for a specified number of years, like Connect America Phase II model-based support for price-cap carriers...The end of the support term may be a qualifying material change that would allow a carrier to file a new forbearance notice if the carrier does not otherwise receive some form of high-cost support in the relevant areas." See also *Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order*, FCC Public Notice, DA 16-1316 (Nov. 22, 2016).

<sup>3</sup> See *AT&T Notice for Forbearance from Lifeline BIAS Requirements*, WC Docket No. 11-42, filed Nov. 23, 2016 ("AT&T 2016 Notice"). In that filing, the AT&T ILEC entities in MO, OK and NV provided notice of forbearance from the Lifeline broadband internet access service requirements in all of the census blocks within their ETC service areas as these entities did not receive any CAF II high-cost support. It was also stated in that filing that "AT&T has made every effort to comprehensively list all of its 'CAF II' Census Blocks in the eighteen AT&T ILEC states listed in Attachment C, but for the avoidance of confusion states that it intends for this list to cover all of its 'CAF II' Census Blocks." There have been some changes to the list of Census Blocks included in Attachment C of the *AT&T 2016 Notice*.

After December 31, 2021, AT&T ILEC entities will no longer receive CAF II or any other high cost support anywhere in the eighteen AT&T ILEC states, including in any CAF II funded Census Blocks, which is a material change in circumstances.

AT&T ILEC entities, which are listed on *Attachment A*, hereby provides notice to accept forbearance relief from any requirement to offer Lifeline benefits on BIAS in all of the census blocks within its ILEC ETC service areas effective January 1, 2022.<sup>4</sup> After that date, AT&T ILEC entities in the eighteen AT&T ILEC states will no longer be subject to the Lifeline service obligation on BIAS.

Please contact the undersigned if you have any questions.

Respectfully submitted,

**/s/ Anisa L. Green**

Anisa L. Green

Attachment

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<sup>4</sup> AT&T did not attach a list of census blocks as it is accepting forbearance throughout its ETC service area in the eighteen AT&T ILEC states.

**Attachment A - List of AT&T ILEC ETCs**

<b>ETC</b>	<b>Study Area Code (SAC)</b>	<b>Designating Authority</b>	<b>Type of Designation</b>	<b>Date of ETC designation</b>
BellSouth Telecommunications, LLC dba AT&T Alabama	255181	State, Docket 23980	High-cost	December 1997
Southwestern Bell Telephone Company dba AT&T Arkansas	405211	State, Docket 97-326-U	High-cost	December 1997
Pacific Bell Telephone Company dba AT&T California	545170	State, Resolution T-16105	High-cost	December 1997
BellSouth Telecommunications, LLC dba AT&T Florida	215191	State, Docket 970744-TP, Order PSC-97-1262-FOF-TP	High-cost	October 1997
BellSouth Telecommunications, LLC dba AT&T Georgia	225192	State, Docket 8259-U	High-cost	November 1997
Illinois Bell Telephone Company dba AT&T Illinois	345070	State, Docket 97-0507	High-cost	December 1997
Indiana Bell Telephone Company, Inc. dba AT&T Indiana	325080	State, Case # 41052-ETC-39	High-cost	December 1997
Southwestern Bell Telephone Company dba AT&T Kansas	415214	State, Docket 98-GIMT-241-GIT	High-cost	December 1997
BellSouth Telecommunications, LLC dba AT&T Kentucky	265182	State, Case # 360	High-cost	December 1997
BellSouth Telecommunications, LLC dba AT&T Louisiana	275183	State, Docket-Order U-22770	High-cost	October 1997
Michigan Bell Telephone Company dba AT&T Michigan	315090	State, Case # U-11547	High-cost	November 1997
BellSouth Telecommunications, LLC dba AT&T Mississippi	285184	State, Docket 97AD-0552	High-cost	December 1997
BellSouth Telecommunications, Inc. dba AT&T North Carolina	235193	State, Docket P-100, Sub 133c	High-cost	December 1997
The Ohio Bell Telephone Company	305150	State, Case # 97-632-TP-COI	High-cost	December 1997
BellSouth Telecommunications, Inc. dba A&T South Carolina	245194	State, Docket 97-239-C, Order 97-958	High-cost	November 1997
BellSouth Telecommunications, Inc. dba AT&T Tennessee	295185	State, Docket 9700888	High-cost	December 1997
Southwestern Bell Telephone Company dba AT&T Texas*	445216	State, Project # 18100, Order #3	High-cost	December 1997
Wisconsin Bell, Inc. dba AT&T Wisconsin	335020	State, Docket 05-TI-162	High-cost	December 1997

\*AT&T operates as both a CLEC and ILEC ETC in Texas.